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Metropolitan Life Insurance Company

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LINDA WREN, an Individual,

Plaintiff,

vs.

METROPOLITAN LIFE INSURANCE
COMPANY; and DOES 1 through 50,
Inclusive,

Defendants.

CASE NO.: CV 08 3361 MEJ

JOINT STIPULATION OF COUNSEL TO
EXTEND TIME FOR DEFENDANT
METROPOLITAN LIFE INSURANCE
COMPANY TO FILE ITS RESPONSIVE
PLEADINGS BY THIRTY DAYS

[Local Rules 7-12]

Complaint filed: June 2, 2008

Pursuant to Rule 7-12 of the Local Rules of Practice for the United States District Court for the Northern District of California ("Local Rules"), Plaintiff Linda Wren ("Plaintiff") and Defendant Metropolitan Life Insurance Company ("MetLife"), by and through their respective counsel, hereby stipulate to extend the time within which MetLife may answer or otherwise respond to the initial Complaint filed in the Sonoma County Superior Court on June 2, 2008, served upon Defendants on June 11, 2008, and removed to this Court on July 11, 2008 based upon diversity of citizenship and federal question jurisdiction.

Specifically, MetLife shall have an additional thirty (30) days from the response date in which to answer or otherwise respond, which at present is due on July 18, 2008 (five court days after removal), such that a pleading filed on or before August 18, 2008 shall be deemed timely. Good cause exists for this extension because Defendants have only recently retained counsel, and additional time is needed to gather all relevant documents and all matters previously reviewed and considered in connection with Plaintiff's claims, to formulate its interim litigation strategy and to prepare its responsive pleadings.

Pursuant to Local Rule 7-12, this stipulation need not be approved by the judge.

DATED: July 25, 2008

BARGER & WOLEN LLP

By: 

ROYAL F. OAKES
MICHAEL A.S. NEWMAN
Attorneys for Defendant
Metropolitan Life Insurance Company

DATED: July 27, 2008

RICHARD JOHNSTON LAW OFFICE

By: 

RICHARD JOHNSTON
Attorneys for Plaintiff
Linda Wren